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## WWR# 21364987

## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Case No. 16-14661-ref

Robert F. Stoudt Phyllis M. Stoudt

Chapter 13

Debtor

**Hearing Date:** 07/13/2017

Citizens Bank, N.A. **Hearing Time:** 09:30 am

Movant

## REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to F.R.C.P. 34, Movant hereby requests that the Debtor produce for inspection by the undersigned attorney for the Movant the following:

- 1. If you deny any or all of the subsections under Movant's Request for admission No. 1:
  - (a) Canceled check, receipt, proof of money order, or other documentation evidencing that the post-petition payment due on 06/30/2017 through and including 05/12/2017, was tendered to Movant.
- Copies of any and all documents, federal and state court opinions (whether published or unpublished), federal guidelines or other applicable statutory or common law bases upon which you rely in denying Plaintiff's Request for Admission Number 1.

Respectfully Submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

/s/ Keri P. Ebeck KERI P. EBECK, ESQUIRE 436 7th Avenue, Suite 2500 Pittsburgh, PA 15219 (412) 388-7102 Attorney for Movant